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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 MELANIE KEENER, an individual,
12
Plaintiff,

13 v.

14 GERALD R. ANTINORO, an individual;
15 STOREY COUNTY, a political subdivision
of the State of Nevada; DOES I-V, inclusive;
16 and ROE ENTITIES VI-X, inclusive,
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Defendants.
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Case No.: 3:17-cv-00498-RCJ-CBC

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFF TO FILE AN
OPPOSITION TO THE MOTION FOR
PROTECTIVE ORDER (ECF 36) and
MOTION FOR SUMMARY JUDGMENT
(ECF 37) PURSUANT TO LOCAL RULE
IA-6-1**

(First Request as to ECF 36)
(Third Request as to ECF 37)

21 COME NOW the parties, by and through their respective undersigned counsel and file this
22 Stipulation & Order to Extend the Time for Plaintiff to File an Opposition Pursuant to Local Rules
23 IA 6-1 and 7-2 and in support thereof show the Court as follows:

24 **I. FACTUAL BACKGROUND**

25 On November 8, 2018, Defendant filed a Motion for Protective Order along with a Motion
26 for Summary Judgment. The parties, by and through their attorneys, have entered into two
27 Stipulations to extend the time in which to file an Opposition to the Motion for Summary Judgment
28 (ECF 38 and 41). On December 18, 2018, the Court notified Plaintiff that it had failed to file an

1 Opposition to the Motion for Protective Order and had until December 26, 2018 to file an Opposition
2 or it would Grant the Motion.

3 On December 21, 2018 the Court Granted the Proposed Order granting the extension of time
4 in which to file the Opposition to the Motion for Summary Judgment until January 4, 2019. (DKT
5 42 & 43).

6 On December 23, 2018, Plaintiff's counsel's father passed. Plaintiff's counsel is now
7 organizing the church services and the funeral, which will be taking place on January 4-January 7,
8 2019, with the actual funeral taking place in Ely Nevada on the 7th of January 2019. As a result,
9 Plaintiff's counsel will be out of the office during the majority of this time and will be unable to
10 prepare the Oppositions until after the services and funerals are over.

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1 Defense counsel has thus graciously agreed to grant extensions for Plaintiff's counsel to file
2 Oppositions as to all pending Motions, including the Motion for Protective Order (ECF 36) and the
3 Motion for Summary Judgment (ECF 37) until Monday January 14, 2019.

4 Dated this 26th day of December 2018

Dated this 26th day of December 2018

5 FLANGAS DALACAS LAW GROUP

RANDS, SOUTH & GARDNER

6
7 By: Jessica K. Peterson
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By: /s/Douglas Rands with permission
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Attorney for Defendants

13 **ORDER**

14 IT IS SO ORDERED this 27th day of December, 2018.

15
16 R. James
17 UNITED STATES MAGISTRATE JUDGE

18 Respectfully Submitted by:

19 Jessica K. Peterson
20 GUS W. FLANGAS, ESQ.
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